

COMMITTEE ON DENTAL AUXILIARIES

The nine-member Committee on Dental Auxiliaries (COMDA) is responsible for the regulation of dental auxiliaries, including unlicensed dental assistants, registered dental assistants (RDA), registered dental hygienists (RDH), registered dental assistants in extended functions (RDAEF), registered dental hygienists in extended functions (RDHEF), and registered dental hygienists in alternative practice (RDHAP). COMDA regulates approximately 44,500 licensed dental auxiliaries: 29,900 RDAs, 13,900 RDHs, 670 RDAEFs, 10 RDHEFs, 20 RDHAPs, and it is unknown how many unlicensed dental assistants are currently practicing in California.

As established by statute, COMDA is created within the jurisdiction of the Dental Board of California (Board). It has statutorily-granted authority to regulate the licensing and examination of dental auxiliaries. However, the Board maintains the authority for enforcement actions against licensees of this profession.

This is the second sunset review of COMDA, which received a standard four-year sunset extension in 1997 (SB 826, Greene, Chapter 704, Statutes of 1997). Unresolved issues from the first review include the composition of COMDA, and its effectiveness in regulating dental auxiliaries.

In regard to the composition of COMDA, SB 713 (Rosenthal, Chapter 538, Statutes of 1997), which was sponsored by the California Dental Hygienists' Association, requires that the member of the Board appointed to COMDA be a public member, rather than a licensed dentist.

1. Continue to Regulate Dental Auxiliaries

The Department concurs with the JLSRC's recommendation to continue regulation of dental auxiliaries. Dental care at all levels affects the health and safety of Californians and requires a high level of skill.

2. Base Scope of Practice for Dental Auxiliaries on General Scope of Duties

COMDA indicates that the Board has rejected several recommendations to expand the scope of practice for dental auxiliaries. Many of these recommendations were based on duties that dental auxiliaries are educated and trained to perform in a competent manner. In fact, some of the recommended changes were based on extensive occupational analyses performed on RDHs and RDHEFs.

In addition, the profession has expressed concerns that certain procedures that have been authorized for one classification are being delegated to unlicensed dental assistants or other classifications that are not authorized to perform those duties.

The Department recommends that a more structured framework be applied in defining the scope of practice for dental auxiliaries and that the scope of practice be based on a general range of duties. Currently, COMDA and the Board tend to regulate by function and product which is restrictive and fails to provide the flexibility to train and allow dental assistants and hygienists to perform new functions. In addition, limiting the practice of dental auxiliaries by function and product requires COMDA to continually update their existing laws and regulations to conform to the standard of practice as it evolves.

3. Increase Education Requirements in Radiation Safety and Coronal Polishing

The Board and COMDA believe that all RDAs and new RDA applicants should be required to complete approved courses in radiation safety and coronal polishing to ensure consumer protection.

According to COMDA, radiation safety courses are approximately 36 to 40 hours in length and cost about \$175, and coronal polishing courses are approximately 12 hours in length and cost about \$150. In addition, COMDA estimates that approximately 63% of the current RDAs already possess a coronal polishing certificate. The number of radiation safety certificates is unknown since these certificates are issued to unlicensed dental assistants as well as RDAs.

COMDA indicates that the Board is in support of this concept. In fact, at the Board's February 2001 meeting, the Board approved proposed legislation submitted for review by COMDA to address this issue.

The Department agrees with COMDA that the health, safety, and welfare of the public may be at risk by allowing RDAs to perform these functions without appropriate instruction and certification.